### IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 24-

v. : DATE FILED:

JONATHAN BRODECKI : VIOLATIONS:

a/k/a "jack\_goodric" 18 U.S.C. § 2422(b) (use of an interstate

: commerce facility to entice a minor to engage in sexually explicit conduct – 8

: counts)

18 U.S.C. § 2251(a), (e) (manufacture and

attempted manufacture of child

: pornography - 2 counts)

18 U.S.C. § 2252(a)(4)(B), (b)(2)

: (possession of child pornography - 1

count)

: Notice of forfeiture

### **INDICTMENT**

### **COUNTS ONE THROUGH EIGHT**

### THE GRAND JURY CHARGES THAT:

On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, and elsewhere, defendant

### JONATHAN BRODECKI, a/k/a "jack goodric"

used a facility and means of interstate and foreign commerce, that is, the Internet, to knowingly persuade, induce, entice and coerce the minors listed below, each under the age of 18 years and known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacture and the attempted manufacture of child pornography, in violation of Title 18, United States Code, Section 2251(a), and corruption of the morals of a minor,

in violation of 18 Pa.C.S.  $\S$  6301, and attempted to do so.

Count	Date	Child
ONE	In or about December 2023	Minor #1
TWO	On or about November 29, 2023 to on or about December 3, 2023	Minor #2
THREE	On or about December 1, 2023 to on or about December 11, 2023	Minor #3
FOUR	On or about December 2, 2023 to on or about December 3, 2023	Minor #4
FIVE	On or about November 26, 2023 to on or about December 4, 2023	Minor #5
SIX	In or about November 2023	Minor #6
SEVEN	In or about December 2023	Minor #7
EIGHT	In or about November 2023 to in or about December 2023	Minor #8

All in violation of Title 18, United States Code, Section 2422(b).

### **COUNTS NINE AND TEN**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, each date constituting a separate offense, in the Eastern District of Pennsylvania, and elsewhere, defendant

### JONATHAN BRODECKI, a/k/a "jack goodric"

employed, used, persuaded, induced, enticed, and coerced the minors listed below, each under the age of 18 years and known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by enticing and directing the minors to engage in sexually explicit conduct and produce an image of that conduct, and defendant BRODECKI knew and had reason to know that the visual depictions would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce:

Count	Date	Child
NINE	On or about December 9, 2023	Minor #3
TEN	In or about November 2023	Minor #6

All in violation of Title 18, United States Code, Section 2251(a), (e).

### **COUNT ELEVEN**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2024, in the Eastern District of Pennsylvania, defendant

### JONATHAN BRODECKI, a/k/a "jack goodric"

knowingly possessed matter, that is, an Apple iPad, model A1893, bearing serial number DMPWPM8UJF8J, which contained visual depictions that had been shipped and transported in interstate and foreign commerce and which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of a minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B), (b)(2).

### NOTICE OF FORFEITURE

### THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections
 2422(b), 2251(a), and 2252(a)(4)(B), as set forth in this indictment, defendant

### JONATHAN BRODECKI, a/k/a "jack goodric"

shall forfeit to the United States of America:

- (a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:
  - (1) One Apple iPad, model A1893, bearing serial number DMPWPM8UJF8J; and
  - (2) One Apple MacBook Pro, Model: A2338, bearing serial number FVFG3H16Q05D.

Pursuant to Title 18, United States Code, Sections 2428 and 2253.

JACQUELINE C. ROMERO
United States Attorney

No.

## UNITED STATES DISTRICT COURT

## Eastern District of Pennsylvania

### Criminal Division

# THE UNITED STATES OF AMERICA

VS.

### JONATHAN BRODECKI a/k/a "jack\_goodric"

INDICTMENT

18 U.S.C. § 2422(b) (use of an interstate commerce facility to entice a minor to engage in sexually explicit conduct - 8 counts) Counts

18 U.S.C. § 2251(a), (e) (manufacture and attempted manufacture of child pornography - 2 counts) 18 U.S.C. § 2252(a)(4)(B), (b)(2)(possession of child pornography - 1 count)

